

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

NO.

v.

DANNY BORGOS

3 - 14 CR - 486 - N

The Grand Jury Charges:

INDICTMENT

Count One

Receipt of Obscene Visual Representations
of the Sexual Abuse of Children
(Violation of 18 U.S.C. § 1466A(a)(1) and (d)(5))

On or about October 9, 2014, in the Dallas Division of the Northern District of Texas, the defendant, **Danny Borgos**, in the territorial jurisdiction of the United States, did knowingly receive a visual depiction of a minor engaging in sexually explicit conduct, as that term is defined in 18 U.S.C. § 2256(2)(A), which is obscene, to wit: at Seagoville Federal Correctional Institution, the defendant, **Danny Borgos**, did knowingly receive from an unknown person, a paginated series of drawings, consisting of 37 pages in a comic book-style format, and the cover page labeling it as a "Kidskin COMIXXX" presentation bearing the title "Three Daughters Pt. 1" and featuring three minor girls, "Becca," age 11, "Jenny," age 6, and "Annie," age 9, containing several visual depictions of minors engaging in sexually explicit conduct that are obscene. Some of these drawings are described as follows:

Page Number	Description
Preface	A drawing depicting a naked man lying down with three naked minor girls. The man is depicted penetrating one of the minor girl's genitals with his tongue. The second naked minor girl is depicted lying next to the man and holding his penis and exposing her genitals. The third naked minor girl is depicted licking the man's penis while kneeling. There is handwriting on the top page identifying the minor girls as the man's daughters and handwriting on the bottom of the page stating: "IT BEGAN A YEAR AGO WITH BECCA ... SHE WAS TEN .."
1	A series of framed drawings narrating and depicting a minor girl's interest in sex. The top of the page narrates a sex education class featuring a minor girl, "Becca," including a frame (upper right) depicting the minor girl raising her hand and asking her teacher, "WHAT'S <u>ORAL</u> SEX?" The bottom half of the page contains five drawings of the minor girl. In all of these five drawings the minor girl is depicted either naked, partially naked, or exposing her genitals. The minor girl is depicted masturbating in three of these five drawings. There is handwriting on the bottom of the page stating: "SHE WAS TEN YEARS OLD AND SHE LOVED TO MASTERBATE [sic], BUT IT WASN'T ENOUGH ..."
4	A series of framed drawings depicting a naked minor girl and a man, identified as the minor girl's father. In all but one of the frames the man's penis is exposed. The captions narrate the minor girl's curiosity about her father's penis and her father wanting her to touch and kiss his penis. In seven of these frames, the minor girl is depicted either touching, kissing, licking, or sucking the man's penis. In one frame, while penetrating the minor girl's mouth with his penis, the man is captioned saying, "OH! SWEET BABY! YES!"
5	A series of framed drawings depicting a minor girl and a man, identified as the minor girl's father. Some of the framed drawings depict the man penetrating the minor girl's mouth with his penis. In some of these framed drawings, the man is ejaculating on the minor girl's face, bare chest, and stomach. There is handwriting on the bottom right frame stating: "BECCA FELL IN LOVE AND SO BEGAN BECCA'S EDUCATION ..."
7	A series of framed drawings depicting a naked man and a minor girl. The series begins with the minor girl wearing only panties and a bra, and in the third frame (upper right), the man is depicted removing the minor girl's panties. In the remaining frames the minor girl is naked,

	and the man is depicted inserting an object, and then his penis, into her genitals. In the sixth frame (bottom left), the man is captioned instructing the minor girl, "EASY BABY. . . NICE N' SLOW," as he is depicted penetrating her genitals with his penis. In the seventh and eighth frames (bottom middle and bottom right), the minor girl's genitals are depicted bleeding on the man's penis during sexual intercourse.
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Prior to October 9, 2014, the defendant, **Danny Borgos**, was convicted on July 31, 2013, in the United States District Court for the Southern District of New York, for the felony offenses of Receipt and Distribution of Child Pornography and Possession of Child Pornography in Cause Number 12 R. 00256, offenses in violation of 18 U.S.C. §§ 2252A(a)(2)(B) and 2252A(a)(5)(B), respectively.

All in violation of 18 U.S.C. § 1466A(a)(1) and (d)(5), the penalties for which are provided in 18 U.S.C. § 2252A(b)(1).

Count Two
 Possession of Obscene Visual Representations
 of the Sexual Abuse of Children
 (Violation of 18 U.S.C. § 1466A(b)(1) and (d)(5))

On or about October 9, 2014, in the Dallas Division of the Northern District of Texas, the defendant, **Danny Borgos**, in the territorial jurisdiction of the United States, did knowingly possess a visual depiction of a minor engaging in sexually explicit conduct, as that term is defined in 18 U.S.C. § 2256(2)(A), which is obscene, to wit: at Seagoville Federal Correctional Institution, the defendant, **Danny Borgos**, did knowingly possess a paginated series of drawings, consisting of 37 pages in a comic book-style format, and the cover page labeling it as a "Kidskin COMIXXX" presentation bearing the title "Three Daughters Pt. 1" and featuring three minor girls, "Becca," age 11, "Jenny," age 6, and "Annie," age 9, containing several visual depictions of minors engaging in sexually explicit conduct that are obscene. Some of these drawings are described as follows:

Page Number	Description
8	A series of three framed drawings depicting a naked minor girl and a naked man, identified as the minor girl's father, engaging in sexual intercourse. The man is depicted penetrating the genitals of the minor girl with his penis in each frame. The first frame (upper left) captions the minor girl stating, "OH! OH! DADDEEEE ...". The second frame (upper right) captions the minor girl stating, "OOOOH PAPA! I LOVE YOUR GREAT BIG COCK IN MY CUNNY!" The third frame (bottom) captions the man thinking "MMM ... 'SUCH A NICE TIGHT PUSSY .. I CAN'T BELIEVE I'M FUCKING MY DAUGHTER ... SHE'S SO BEAUTIFUL.'" The third frame also depicts the face of someone peeking through the window from the

	outside with a surprised look while watching the man and the minor girl engage in sexual intercourse. The following page (Page 9) identifies this peeking person as the man's other minor daughter.
13	A series of drawings depicting a naked minor girl and a naked young man, who have previously been identified as "Annie" and "Jason," respectively, on Page 10. In the six frames at the top, the minor girl is performing oral sex on the man. In one of these six frames, the man is captioned saying, "JEEZ, YOU ARE <u>SOMETHING</u> LITTLE GIRL.. I CAN'T BELIEVE YOUR'E [sic] ONLY 9. I CAN'T POP YOUR CHERRY BUT I HAVE <u>GOT</u> TO FUCK YOU. CAN I TEACH YOU SOMETHING WAY COOL?" In the seventh frame (bottom left), the man is depicted penetrating the minor girl's anus with his thumb, presumably lubricated with baby oil, and the minor girl is captioned saying, "I DON'T WANNA DO IT IF IT HURTS." The man is then captioned responding, "IT WON'T, I PROMISE ... MY COUSIN MIMI LOVES IT, AND SHE'S ONLY 7 ..." In the last frame (bottom right), the man is depicted penetrating the minor girl's anus with his penis. In this last frame the minor girl is captioned thinking, "OOOH I <u>LIKE</u> IT IN MY BOTTOM ... I BET BECCA DOESN'T KNOW 'BOUT <u>THIS</u> ." The man is captioned thinking, "UNBELIEVABLE."
26	A series of framed drawings depicting a naked minor girl, identified as "Jenny," age 6, and two naked minor boys. In the first frame (upper left), the minor girl is depicted exposing her genitals for the boys while one boy is depicted holding his penis as he looks at her. In the second frame (upper right), the minor girl is captioned saying, "I WANT TO SUCK ON <u>BOTH</u> YOUR COCKS." In the fourth frame (bottom left), the minor girl is depicted licking one of the boy's scrotum, and in the fifth frame (bottom right), the minor girl is depicted performing oral sex on both boys simultaneously.
31	A series of framed drawings depicting two naked minor girls and a naked man. The series depicts the two minor girls performing oral sex on the man. In the second frame (upper right), one of the minor girls is depicted standing behind the other minor girl, who is sitting on a stool, as the other girl is depicted sucking the man's penis. In this frame the minor girl standing is captioned saying, "I WANT SOME TOO."
35	A drawing depicting a naked man and two naked minor girls. The man is depicted placing his tongue on one of the minor girls while the other minor girl's mouth is being penetrated by the man's penis. At

(Last Page)	the top of the page there is handwriting stating: "To Be Continued"
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Prior to October 9, 2014, the defendant, **Danny Borgos**, was convicted on July 31, 2013, in the United States District Court for the Southern District of New York, for the felony offenses of Receipt and Distribution of Child Pornography and Possession of Child Pornography in Cause Number 12 R. 00256, offenses in violation of 18 U.S.C. §§ 2252A(a)(2)(B) and 2252A(a)(5)(B), respectively

All in violation of 18 U.S.C. § 1466A(b)(1) and (d)(5), the penalties for which are provided in 18 U.S.C. § 2252A(b)(2).

Notice of Forfeiture
(18 U.S.C. § 2253(a)(1) and (3))

Upon conviction of any or all of the offenses alleged in this Indictment and pursuant to 18 U.S.C. § 2253(a), the defendant, **Danny Borgos**, shall forfeit any visual depiction described in 18 U.S.C. § 1466 and (a) any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in the respective offense; (b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the respective offense; and (c) any property, real or personal, used or intended to be used to commit or to promote the commission of the respective offense and any property traceable to such property.

The above-referenced property subject to forfeiture from the defendant includes, but is not limited to the following:

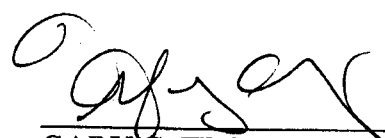
1. A paginated series of drawings, consisting of 37 pages in a comic book-style format, and the cover page labeling it as a "Kidskin COMIXXX" presentation bearing the title "Three Daughters Pt. 1" and featuring three minor girls, "Becca," age 11, "Jenny," age 6, and "Annie," age 9, containing several visual depictions of minors engaging in sexually explicit conduct.

A TRUE BILL:


FOREPERSON

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DALLAS DIVISION

THE UNITED STATES OF AMERICA

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DANNY BORGOS

INDICTMENT

18 U.S.C. § 1466A(a)(1) and (d)(5)
Receipt of Obscene Visual Representations
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18 U.S.C. § 1466A(b)(1) and (d)(5)
Possession of Obscene Visual Representations
of the Sexual Abuse of Children

(2 COUNTS)

A true bill rendered:

FORT WORTH

 FOREPERSON

Filed in open court this 10th day of December, A.D. 2014.

In State Custody: Warrant to Issue


UNITED STATES MAGISTRATE JUDGE